

FCC needs to go a simple approach that doesn't require much regulation yet at the same time provides diversity and allows small businesses to acquire new licenses. Years ago you couldn't have ANY overlapping service areas in the same service. That regulatory method only required negligible processing by Commission staff. Additionally, diversity in radio and TV was automatic because new stations were granted ONLY to businesses that were not already in the market.

A modified version of this should be used now. I would propose up to 4 overlapping services. Those could be TV, AM, FM, Cable, DBS, or Newspaper. You can Mix-N-Match but only 4 overlapping. The appropriate city-grade contour would be used to determine AM, FM, TV for overlap purposes. Cable and newspapers would simply be drawn as a 10-mile radius around the center-city coordinates. A DBS provider would automatically lose one service in each cluster nationwide.

Large station owners such as Viacom would be "grandfathered" from having to sell any facilities however they would be prohibited from increasing the number of overlaps if it was over 4 in the cluster.

While this is beyond the scope of this proceeding, the FCC needs to find other ways to encourage new entrants into the broadcasting business. While a 25% bidding credit is helpful it's pretty insignificant when the bid prices get inflated to millions of dollars.